



United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

April 2, 2020

BY ECF

The Honorable Paul A. Crotty
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl St.
New York, NY 10007

4-3-2020
Ms. Chandler will
serve as third-party
custodian. SO
ORDERED.

Re: United States v. Chandler, 19 Cr. 867 (PAC)

Dear Judge Crotty:

Following the Court's Order this morning, the Government has directed the Marshals to produce the defendant for release. The Government respectfully submits this letter to request an additional condition to the appearance bond, which is required under 18 U.S.C. § 3142(i)—that the defendant be released into the custody of another person. See 18 U.S.C. § 3142(i) (permitting “the temporary release of the person, in the custody of a United States marshal or another appropriate person”); United States v. Perez, No. 19 CR. 297 (PAE), 2020 WL 1329225, at *1 (S.D.N.Y. Mar. 19, 2020) (designating third-party custodian).

The parties have conferred and agreed that the defendant's mother, Sandra Chandler, with whom the defendant will be living during his home incarceration, will serve as third-party custodian. The Government accordingly requests that the bond be modified to designate Sandra Chandler as the third-party custodian of the defendant during his temporary release. The defense consents.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney for the
Southern District of New York

by: /s/ Jun Xiang
Jun Xiang
Michael D. Longyear
Assistant United States Attorneys
(212) 637-2289 / -2223

CC Defense Counsel (By ECF)